

anderson bill ray.TXT

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1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 NORTHERN DISTRICT OF OKLAHOMA
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W. A. DREW EDMONDSON, in his)
5 capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
6 OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
7 in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
8 FOR THE STATE OF OKLAHOMA,)

9 Plaintiff,)

10 vs.)

11 TYSON FOODS, INC., et al,)

12 Defendants.)

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14 THE DEPOSITION OF BILL RAY
15 ANDERSON, produced as a witness on behalf of the
16 Plaintiff in the above styled and numbered cause,
17 taken on the 10th day of July, 2007, in the City of
18 West Siloam Springs, County of Delaware, State of
19 Oklahoma, before me, Lisa A. Steinmeyer, a Certified
20 Shorthand Reporter, duly certified under and by
21 virtue of the laws of the State of Oklahoma.
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1 A P P E A R A N C E S

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3 FOR THE PLAINTIFFS: Mr. Richard Garren
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Tulsa, OK 74119

5 -and-
Mr. Louis W. Bullock
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9 Attorney at Law
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Fayetteville, AR 72701

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12 FOR CARGILL: Ms. Theresa Noble Hill
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FOR SIMMONS FOODS: Mr. Josh Wisley
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FOR PETERSON FARMS:

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Ms. Nicole Longwell

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FOR POULTRY PARTNERS:

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1 FOR GEORGE'S:

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3 W I T N E S S

P A G E

4 BILL RAY ANDERSON

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Direct Examination by Mr. Garren

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Cross Examination by Mr. Williams

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Cross Examination by Ms. Thompson

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Redirect Examination by Mr. Garren

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Recross Examination by Ms. Thompson

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Signature Page

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Reporter's Certificate

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11 Q I think Mr. Garren asked about this but I want
12 to make sure it's clear. You testified that you
13 built the houses, the poultry houses that are
14 located at what we've called the old home place and
15 down by Flint Creek; correct?

03: 27PM

16 A Yes.

17 Q And did you borrow money from a bank or a
18 financial institution to build those houses?

19 A I borrowed from a bank.

20 Q Who makes the payments on that note?

03: 27PM

21 A I did.

22 Q Is it paid off now currently or are you still
23 making payments?

24 A Yes. It's paid off.

25 Q Thank you. Do you have equipment that you --

03: 27PM

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1 do you own equipment that you use in your poultry
2 operations?

3 A Do you mean clean-out and stuff like that?

4 Q Well, you've stated that you have a bobcat
5 that you use for cleaning out and a spreader truck
6 for cleaning out?

03: 28PM

7 A Yes.

8 Q Do you have other equipment that's used on a
9 day-to-day business in the poultry operation?

10 A No.

03: 28PM

11 Q And is there a fence that surrounds the
12 poultry houses that are located at the old home
13 place?

14 A Yes.

15 Q And is there a fence that surrounds the
16 poultry houses that are located near Flint Creek?

03: 28PM

17 A Yes.

18 Q Approximately how many acres at the old home
19 place are located outside the fence?

20 A 150 probably.

03: 28PM

21 Q And at the land that's near Flint Creek, how
22 many acres are located outside of the fence?

23 A 175 probably, 80.

24 MS. THOMPSON: I think that's all the
25 questions I have.

03: 28PM

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REDIRECT EXAMINATION

1 BY MR. GARREN:

2 Q That unfortunately led to a couple more, Mr.
3 Anderson.

4 A Huh?

03: 29PM

5 Q That led to a couple more questions for me.
6 With regard to your fence around both the poultry
7 barns you have set up, Cobb requires that fence,
8 don't they?

9 A Yes.

03: 29PM

10 Q When you said that you sometimes give hay to
11 your neighbors, we're not talking very far away
12 neighbors, are we?

13 A No.

14 Q Most of the hay you're growing in the Illinois
15 River watershed pretty much stays in the Illinois
16 River watershed, doesn't it?

03: 29PM

17 A Let's see. I'm trying to think. Pretty well.

18 Q So I'm clear, we talk about spreading or
19 applying poultry waste to the land. Do you till it,
20 work it into the land when you spread it or you

03: 29PM